

# Exhibit 48

Mark A. Pollak

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SUPERIOR COURT OF NEW JERSEY

LAW DIVISION - ATLANTIC COUNTY

MASTER DOCKET NO. ATL-L-2648-15

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IN RE: TALC-BASED POWDER PRODUCTS : Case No.  
: 300  
Applicable to All Cases : Civil Action  
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IN THE SUPERIOR COURT  
OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION  
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LORI OULES,

Plaintiff,

V.

Civil Action No.

JOHNSON & JOHNSON, et al.,

2014 CA 008327 B

Defendants.

Judge Brian Holeman

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VIDEOTAPED DEPOSITION OF  
PERSONAL CARE PRODUCTS COUNCIL  
Through its corporate representative

MARK A. POLLAK

Washington, DC 20004

Thursday, February 18, 2016

Reported by: Denise D. Vickery, CRR/RMR

Mark A. Pollak

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<p>1 page 3?</p> <p>2 A. Yeah, I'm fairly certain I've</p> <p>3 reviewed them. Yes.</p> <p>4 Q. Okay. Have you had a chance to go</p> <p>5 over those with your attorneys?</p> <p>6 MR. LOCKE: Objection. We -- in</p> <p>7 my letter dated February 28th and -- or --</p> <p>8 excuse me -- January 28th and February 5th,</p> <p>9 we asserted our objections to the</p> <p>10 definitions consistent with -- to the</p> <p>11 extent they're inconsistent with New Jersey</p> <p>12 or District of Columbia law.</p> <p>13 BY MR. GOLOMB:</p> <p>14 Q. Did you look at the definitions</p> <p>15 beginning on page 3, Mr. Pollak?</p> <p>16 A. Uh-huh.</p> <p>17 Q. You have to give a verbal yes --</p> <p>18 A. Yes. Sorry.</p> <p>19 Q. -- answer. Thank you.</p> <p>20 And those definitions continue</p> <p>21 through page 8; is that correct?</p> <p>22 A. Correct.</p> <p>23 Q. And did you understand the various</p> <p>24 terms in paragraphs 1 through 23 under the</p> <p>25 definitions?</p>	<p>1 you look at?</p> <p>2 A. So I looked at what's on our website</p> <p>3 about membership, information on the foundation</p> <p>4 and its mission. I took a look at the CIR</p> <p>5 procedures and some of the other information they</p> <p>6 have through their website.</p> <p>7 Q. And what is the CIR?</p> <p>8 A. The Cosmetic Ingredient Review</p> <p>9 program.</p> <p>10 Q. And what does the CIR do?</p> <p>11 A. So the CIR is an independent</p> <p>12 organization that reviews the scientific</p> <p>13 literature on the safety of cosmetic ingredients</p> <p>14 and makes a determination based on this</p> <p>15 information as to whether an ingredient is safe,</p> <p>16 unsafe, or needs further study before being used.</p> <p>17 Q. And when you say "independent," what</p> <p>18 do you mean by that?</p> <p>19 A. Although it is funded by the</p> <p>20 Personal Care Products Council, the -- we do not</p> <p>21 control the decision-making of the expert panel,</p> <p>22 and these are outsiders similar to the OTC drug</p> <p>23 review process.</p> <p>24 Q. So the PCPC funds the CIR?</p> <p>25 A. Correct.</p>
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<p>1 A. I think so.</p> <p>2 Q. Okay. Do you have any questions</p> <p>3 about any of them?</p> <p>4 A. No.</p> <p>5 Q. And beginning on page 8, there are</p> <p>6 -- there's some instructions. It's a single</p> <p>7 instruction. It says:</p> <p>8 "The deponent is instructed to</p> <p>9 produce at deposition: copies of any and all</p> <p>10 documents reviewed or read in preparation for the</p> <p>11 deposition."</p> <p>12 Let's talk about what it is that you</p> <p>13 reviewed or read to prepare you for your</p> <p>14 deposition, other than this notice of deposition</p> <p>15 and other than the two documents that your</p> <p>16 attorney provided today and Dr. Loretz's</p> <p>17 deposition transcript.</p> <p>18 What else did you review?</p> <p>19 A. So I took a look at some of the</p> <p>20 other publicly available information on the</p> <p>21 Personal Care Products Council and related</p> <p>22 organizations, such as the Cosmetic Ingredient</p> <p>23 Review and the Personal Care Products Foundation.</p> <p>24 Q. Okay. When you say "publicly</p> <p>25 available" materials, what specifically did</p>	<p>1 Q. And, in fact, they share office</p> <p>2 space --</p> <p>3 A. Correct.</p> <p>4 Q. -- with the CIR; is that correct?</p> <p>5 And so every dollar spent by the</p> <p>6 independent cosmetic review -- the Cosmetic</p> <p>7 Ingredient Review -- I'm sorry -- comes from</p> <p>8 PCPC?</p> <p>9 A. Correct. Yes.</p> <p>10 Q. And who are the employees of the</p> <p>11 CIR?</p> <p>12 A. So there are six or seven employees</p> <p>13 who are basically in the areas of administration</p> <p>14 or science writers. There is a -- at least one</p> <p>15 is a toxicologist, but basically helping to put</p> <p>16 together the reports on the ingredient literature</p> <p>17 to provide to the expert panel members.</p> <p>18 Q. And how are the expert panel members</p> <p>19 chosen?</p> <p>20 A. There is a set of procedures with a</p> <p>21 CIR steering committee that's composed of seven</p> <p>22 people, and the steering committee makes</p> <p>23 recommendations on nominations for the panel.</p> <p>24 Q. And how are those steering committee</p> <p>25 members chosen?</p>

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